

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE: : CHAPTER 7
: :
DN REAL ESTATE SERVICES & :
ACQUISITIONS, LLC :
: :
Debtor : CASE NO. 17-55587-PMB

**DEBTOR'S COUNSEL RESPONSE TO
UNITED STATES TRUSTEE'S OBJECTION TO
SECOND APPLICATION FOR COMPENSATION**

COMES NOW the undersigned Debtor's counsel and files this Response to the United States Trustee's ("UST") Objection (Doc. No. 140) (the "Objection") to the Second Application for Chapter 11 Legal fees Due to Debtor's Counsel from November 15, 2017 through June 27, 2018 (the "Fee App") (Doc.No.132), showing the Court as follows:

The Objection makes the following objections to the Fee App:

1. Fees after conversion are not recoverable.
2. Time entries do not sufficiently apportion time among sub-activities.
3. Time entries lack sufficient details.
4. Time entries suggest a failure to keep contemporaneous records.
 - a. November 16, 2017.
 - b. December 22, 2017
 - c. February 20, 2018
 - d. March 23, 2018
 - e. April 30, 2018
5. Chapter 11 Plan preparation is not recoverable (because it was after Default Declaration)
6. Costs are not detailed.
7. November 15, 2017 Motion to Sell charges 200 for \$181 motion fee.

To assist the Court and all parties to review the above matters, Debtor's counsel will review them in turn in the Response below. Additionally, Debtor's counsel attaches to this Response,

an amended spreadsheet of time and costs (the “Amended Timesheet”), with all additions shown in ALLCAPS to assist in evaluating the fees and costs sought in the Fee App. The Revised Timesheets also list the docket numbers where appropriate, and break down time entries to sub-time activities.

ITEMIZED RESPONSES TO TRUSTEE’S OBJECTIONS

1. Fees after conversion are not recoverable.

AGREE, WITH LIMITED EXCEPTION. While this is true for most time a counsel expends after conversion to Chapter 7, in this case, the Conversion Order itself required Debtor’s counsel to file fee applications for all professionals involved in the case. It would defy logic and unfairly penalize the appointed professionals to allow them to seek fees, but not to submit the time spent in doing so.

2. Time entries do not sufficiently apportion time among sub-activities.

AGREE. The Amended Timesheet uses ALLCAPS to apportion time.

3. Time entries lack sufficient details.

AGREE. The Amended Timesheet uses ALLCAPS to add additional details where needed to assist the Court and Trustee to evaluate the propriety of the fees sought.

4. Time entries suggest a failure to keep contemporaneous records.

AGREE. The time entries have a few inconsistencies which do suggest this. However, as shown below for each instance pointed out by the Trustee, the errors are corrected in the Amended Timesheet.

- a. November 16, 2017. In this case, the proper date was November 18, not November 16. Amended Timesheet corrected for this error and waive the fees for the entry. The error was caused by entering time on a certain date (Nov. 18), when the timekeeping software had been logged into two days prior and not updated or re-started. Debtor's counsel assumes responsibility for this error. The details and time for the entry were proper.
- b. December 22, 2017 This paralegal time was entered remotely on December 22, but applies to time on Dec. 20. He erroneously stated "fee application" when he intended the Order granting said fee application. Amended Timesheet reflects this correction.
- c. February 20, 2018 January report was timely filed on this day. The Feb. 28 filing was for October 2017 report. Nonetheless, Amended Timesheet withdraws fees for the Feb. 20 line item.
- d. March 23, 2018 This hearing was on March 26, not March 23. Again, time was entered into a software program which had not been reset. Actions entered on March 26 were tagged with a date of March 23 due to failure to log off and log back into the program. Amended Timesheet corrects the entry AND withdraws the entire fee from this entry.
- e. April 30, 2018 This month-end remote entry captured time from April 26 that was already entered. The April 30 entry is both corrected and withdrawn in the Amended Timesheet.

5. Chapter 11 Plan preparation is not recoverable (it was after Default Declaration).

DISAGREE. The Chapter 11 Plan and Disclosure Statement were required by this Court's order dated May 9, 2018 (Doc. No. 111). The deadline of May 31, 2018 happens to be the exact same date as the order converting the case to Chapter 7. Debtor's counsel worked many hours to prepare a confirmable liquidating plan and filed it on the date that was required. To withhold payment for this time would be unjust. Debtor's counsel had multiple conversations with UST and with newly appointed Chapter 7 trustee about the advantages of remaining in a liquidating Chapter 11 plan. Without regard to which

counsel has also not charged for the hours spent post conversion including preparing for and attending the 341 meeting of creditors and for the time to revise the Fee App and to defend its propriety.

The Amended Timesheet reveals costs in the amount of \$777.70. The final revised fees and costs sought, as shown in the Amended Timesheet is **\$13,777.70.**

Dated: November 12, 2018

/s/
Howard P. Slomka
Georgia Bar #652875
Attorney for the Debtor
Slipakoff & Slomka, PC
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Slipakoff & Slomka, LLP
Time Activities by Client Detail
 Activity: November 7, 2017 - June 21, 2018

AMENDED TIMESHEET

* ENTRIES IN ALLCAPS ARE AMENDED SINCE ORIGINAL FEE APPLICATION

Activity Date	Employee	Memo/Description	Rates	Duration	Original Amount	Amended Amount
11/7/2017	HOWIE SLOMKA	THIS TIME WAS NOT BILLED IN FIRST FEE APPLICATION: PREPARE AND FILE MOTION TO SELL ANTONE STREET PROPERTY AND NOTICE OF HEARING/ SERVICE (1.5 HOUR) CONFIRM EQUITY WITH BROKER AND CLIENT AND DISCUSS CLOSING LOGISTICS (30 MIN); DOC NUMBER 70.	350	2	0	\$ 700.00
11/10/2017	HOWIE SLOMKA	DOC NO. 73 AND 74 PREPARE AND FILE OBJECTION TO JEFF STAMEY SECURED POC. (45 MINS) CALLS TO CREDITOR COUNSEL TO DISCUSS OBJECTION (15 MINS) ; PREP AND FILE NOTICE OF HEARING AND PREPARE DRAFT ORDER. (45 MINS) SERVICE ON ALL PARTIES. (30 MINS)	350	2.25	0	GRATIS
11/13/2017	HP5	DOC 75 - PREP AND FILE COS FOR OBJECTION TO POC 7				GRATIS
11/14/2017	Howie Slomka	THIS TIME WAS INCLUDED IN FIRST FEE APPLICATION - NO FEES SOUGHT HERE. Prep and file FIRST Fee Application [DOC NO. 76] (1 HOUR). PREPARE, PRINT, REVIEW AND CONFIRM TIME SHEETS THROUGH FIRST FEE APP: 30 MINUTES. confirm dates for mtn to sell with regard to Dec 5 closing date. 30 MINUTES	350.00	2	0.00	\$ -
11/15/2017	Howie Slomka	11/08/2017 DOC 72 ---MOTION TO SELL ANTONE STREET HAD FEE OF \$181 THAT WAS paid by LAW FIRM check. THIS COST IS RIGHTFULLY COLLECTED IN THIS SECOND FEE APPLICATION. BUT ONLY UP TO \$181 FILING FEE AS THE SERVICE COSTS WERE INCLUDED IN THE FIRST FEE APPLICATION. DN Real Estate Motion to Sell Real Estate (761 Antone) filing fees and service costs	200.00	1	200.00	\$ -
11/15/2017	Howie Slomka	Time going over docket and prepping and filing new COS . (60 MINUTES WERE SPENT IN REVIEWING COS AND ADDRESSES FOR SOME PRIOR DOCKET ENTRIES ALONG WITH 2 PARALEGALS WHO ASSIST WTH SERVICE). TC client re next sales. DISCUSS EQUITY AND GO OVER LONG TERM PLANS FOR SALES AND PLAN FEASIBILITY (30 MINUTES)	350.00	1.5	525.00	\$ 525.00
11/16/2017	Howie Slomka	Prep and file Suppl motion to set bar date DOC NO. 77 (30 MINS) ; PREPARE AND upload order (LATER FILED AS DOC. NO. 80) (20 MINS)	350.00	0.83333333	291.67	GRATIS

11/16/2017. CORRECTED TO 11/18/2017	Howie Slomka	review docket; file status report re COS and filings. [DOC. NO. 79]. THESE FILINGS WERE NECESITATED WHEN DEBTOR COUNSEL REVIEW OF DOCKET REVEALED MISSING OR UNDOCKETED CERTIFICATES OF SERVICE. OUR OFFICE REVIEW INDICATED THAT ALL WERE SERVED, BUT OUT OF ABUNDANCE OF CAUTION WE RE- SERVED AND MOVED FOR AN EXTENDED CLAIM BAR DATE. IN THIS SUPPLEMENTAL FEE APPLICATION COUNSEL IS WAIVING THIS TIME.	350.00	0.3333333	116.67	GRATIS
11/28/2017	Howie Slomka	NO CHARGE: prep for and attend hrg on motion to sell; tc client re antone sale. THIS WAS ENTERED VIA PHONE FROM COURTHOUSE ON DEC 4 AND UTILIZED THE EARLIER LOG IN DATE/. THE DEC 4 ENTRY BELOW CAPTURES THE SAME TIME.	350.00	1	350.00	WITHDRAWN
12/1/2017	HPS	DOC 83: READ CREDITOR RESPONSE TO MOTION TO APPROVE SALE OF PROPERTY.	350.00	0.25	0.00	GRATIS
12/3/2017	HPS	EMAIL TO HEATHER BROWN RE STAMEY POC OBJECTION; DISCUSS FIGURES. ANTONE BUYER TERMINATION CALLS AND EMAILS.				GRATIS
12/04/2017	Howie Slomka	prep for and attend hearing in BK court (60 minutes); negotiate with lendinghome (30 minutes); TC client (30 minutes) FILED WITHDRAWAL OF POC OBJECTION ; N/C FOR TRAVEL TIME - CALLED CLIENT FROM CAR DRIVING BACK; EMAILS WITH H BROWN	350.00	2	700.00	\$ 700.00
12/05/2017	Howie Slomka	TC Courney re sale of 1010 McDaniel (20 minutes) email to closers (10 minutes) ; prep closing (20 minutes) and amend h4 schedules. (20 minutes) DOC. NO. 86	350.00	1.1666667	408.33	\$ 408.33
12/05/2017	Howie Slomka	withdraw objection to claim (15 minutes); negotiate with H4 counsel (5 minutes)	350.00	0.3333333	116.67	\$ 116.67
12/6/2017	HPS	PREP AND FILE WITHDRAWAL OF STAMEY OBJECTION. DOC NO. 87. SERVE TO INTERESTED PARTIES	350.00	0.33	0.00	GRATIS
12/18/2017	Howie Slomka	EMAIL TO L KOLBA RE FIRST FEE APP AND CONFIRM NO OBJECTIONS; Attend fee app hearing (1 HOUR); review matters (15 MINUTES); tc client re status (15 MINUTES)	350.00	1.5	525.00	\$ 525.00
20-Dec	FB	DOC 89 - FILE NOVEMBER OPERATING REPORT - TIME NOTED IN ENTRY BELOW (20 MINS)			0.00	GRATIS
21-Dec	HPS	EMAILS WITH DEB JACKSON RE PROPERTIES REMAINING TO SELL AND POSSIBILITY OF DISMISS OR CONVERT			0.00	GRATIS

12/22/2017	Fernando Bustelo (Paralegal)	THIS ENTRY BY PARALEGAL IS DATED AND ENTERED ON DEC 22, BUT WAS FOR TIME ON DEC 21 AND DEC 20. THE ENTRY IS CORRECT, BUT BILLING SOFTWARE WAS ON WRONG DATE. Prepare and file application for fee application, and order (HE ACTUALLY ONLY AMENDED AND UPLOADED ORDER ON THIS DATE.. (DOC 90) (20 MINS) as well as COS (DOC 91) Prepare October/November MORs. (40 MINS) Correspondence with closing atty. on closing of Briarlake. (45 MINUTES) HOWIE WAS ON CALL WITH CLOSING COUNSEL - DID NOT BILL TIME	185.00	1.75	323.75	\$ 323.75
12/21/2017	HPS	TEL CALL WITH BRIARLAKE CLOSING COUNSEL. AND CLIENT. AND LENDER COUNSEL. (45 MINUTES)		0.75	0.00	GRATIS
1/8/2018	HPS	EMAIL TO CLIENT RE FILING NOTICE FOR BOF A - TALK WITH CREDITOR; EMAILS TO DAVID KLEIN RE ORDER ON MOTION TO SELL		0.25	0.00	GRATIS
01/08/2018	Fernando Bustelo	TC client re dismissal and future plans	185.00	0.3333333	61.67	\$ 61.67
1/13/2018	HPS	EMAILS WITH CLIENT AND BOFA TO CONFIRM PROPER NOTICE OF CASE.		0.25	0.00	GRATIS
01/19/2018	Howie Slomka	review, edit and file Dec Operating Report (30 MINUTES) - REVIEW EMAIL AND TC TO CLIENT TO FINALIZE REPORT. (DOC. NO. 92)	350.00	0.5	175.00	\$ 175.00
02/07/2018	Howie Slomka	TC client to discuss dismissal or sale of final asset AND OVERALL PLANS FOR CASE AND PLAN OR REORG. 20 MINUTE CALL	350.00	0.3333333	116.67	\$ 116.67
02/20/2018	Howie Slomka	TC client re future of case and sales of props - THIS CALL WAS BEFORE WORKING ON OPERATING REPORTS. DEBTOR WAS OUT OF TOWN ON CELL - HAD TO CALL BACK RE OPERATING REPORTS	350.00	0.0833333	29.17	\$ 29.17
02/20/2018	Howie Slomka	review, revise and file revised operating reports 45 MINUTES; TC client and Fernando re same 45 MINUTES.	350.00	1.3333333	466.67	\$ 466.67
02/20/2018	Howie Slomka	review, prep and file Jan operating report (DOC 93) - HAD TO MAKE REVISIONS AFTER COMPARING TO EARLIER REPORT; AND ADDED TIME ENTRY TO CAPTURE.	350.00	0.25	87.50	GRATIS
02/21/2018	Howie Slomka	TC and emails re sale of Antone Street. (2 HOURS OF REPEAT CALLS TO LENDER COUNSEL, BROKER AND CLOSING COUNSEL. NEGOTIATE PAY OFF AND SHORT SALE AMOUNT, LENDINGHOME AND COUNSEL AND BROKERS.) UST follow up re MOR amendments. (20 MINUTES)	350.00	2.3333333	816.67	\$ 816.67
2/22/2018	HPS	MORE FOLLOW UP EMAILS AND CALLS. RE CLOSING AND INSURANCE DECLARATIONS AND UST CONCERNS.		0.25	0.00	GRATIS
2/26/2018	HPS	EMAILS WITH TALIA EVERETT; CLOSER AND BROKER TO SAVE SALE.		0.25	0.00	GRATIS
02/27/2018	Howie Slomka	emails and calls to try to arrange sale of Antone Street and avoid foreclosure (60 MINUTES TO MULTIPLE PARTIES TO CONFIRM WILLINGNESS AND FEASIBILITY TO CLOSE - AND WITH CLIENT TO TRY TO WORK ON SHORT SALE DEALS). TC to brokers, buyer and client, and lender counsel. Prep and file motion to sell ANTONE STREET real estate AND NOTICES AND SERVICE (DOC 94) (2 HOURS)	350.00	3	1,050.00	\$ 1,050.00

2/27/2018	HPS	TIME TO STUFF AND SERVE DOC 94		0.5	0.00	GRATIS
2/28/2018	Howie Slomka	TC and emails re closing of Antone and short sale. EMAILS WITH T EVERETT AND H BROWN. (15 MINUTES) EXPLAINED MOTION TO PARTIES AND BROKERS AND REQUIREMENT TO AWAIT COURT ORDER. (30 MIN ON PHONE; 15 MINUTES ON EMAIL AND REVIEWING MOTION AND CONTRACT)	350.00	1	350.00	\$ 350.00
02/28/2018	Howie Slomka	reply to Lindsay Kolba email re docs (10 MINUTES) and REVIEW AND FILE October MOR (15 MINUTES) (DOC 96)	350.00	0.25	87.50	\$ 87.50
3/2/2018	fb	(DOC 97,98,99) PARALEGAL TIME WITH CLIENT AND FILING OPERATING REPORTS FOR APRIL, JULY, AUGUST 2017)	185.00	1	0.00	\$ 185.00
3/2/2018	HPS	(DOC 100, DOC 101) PREP AND FILE OPERATING REPORTS FOR NOV AND DEC 2017, REVIEW APRIL, JULY, AUGUST REPORTS WITH FERNANDO (30 MINS...NO CHARGE)		0.5	0.00	GRATIS
3/5/2018	HPS	EMAILS TO LENDINGHOME COUNSEL AND FORECLOSING ATTY. D KLEINA ND BROKER ZACK G CONF CALL.				GRATIS
03/06/2018	Howie Slomka	Try negotiating to stop foreclosure: (1 HOUR - INCLUDING CALLS TO COURTHOUSE STEPS FOR LAST MINUTE APPEALS) lender counsel and broker and buyer all require emails and tc. (30 MINS) unsuccessful in end - property sold at courthouse.	350.00	1.5	525.00	\$ 525.00
3/21/2018	fb	FEB OPERATING REPORT - FILING (DOC NO. 105) REVIEW LENDER OPPOSITION TO PENDING MOTION TO SELL ANTONE (POST FORECLOSURE NOW).		0.5	0.00	GRATIS
03/23/2018. SHOULD BE 3/26/2018	Howie Slomka	prep for and attend hearing in BK court (60 MINS); discuss case closure with UST. THIS ENTRY DATE LOOKS TO BE IN ERROR. MARCH 26 HRG WAS MOOT DUE TO MARCH 6 FORECLOSURE ON ANTONE. DISCUSS WITH UST CONCERNS OVER SALES REPORTING AND REVIEW UST MTD (20). WILL WITHDRAW CHARGE DUE TO INCORRECT DATE ON ORIGINAL FILING.	350.00	1.3333333	466.67	WITHDRAWN
3/23/2018	HPS	EMAIL WITH UST AND DISCUSS WITH CLIENT REGARDING MONTHLY REPORTS AND REPORTING OF NET OR GROSS SALES PROCEEDS. EMAIL RE UST FEES AS WELL. (15 MINS)	350.00	0.25		GRATIS
4/18/2018	HPS	TC WITH FERNANDO TO GO OVER MORS AND STATEMENTS.	350.00	0.05		GRATIS
04/25/2018	Howie Slomka	Review home closings and MOR for trustee's motion (45 MINUTES TO REVIEW CLOSING STATEMENTS AND CONTRACTS) (45 MINUTES TO RESEARCH AND PREP ARGUMENTS AND RESPONSES TO UST'S MTD. OPEN ISSUE STILL RELATES TO WHETHER DEBTOR OWES UST QUARTERLY FEES OF GROSS SALES PRICE, OR ONLY ON NET PROCEEDS AFTER LOAN PAYOFF. RESEARCH SAME IN PRIOR CASES.	350.00	1.5	525.00	\$ 525.00
4/26/2018	Howie Slomka	review claims (30 MINS) and plan status (15 MINS); prep for May 31 deadline to file disclosure statement (30 MINS); DRAFTING PLAN RELATED DOCS AND CREATING SPREADSHEET WOR PAYMENTS AND PAYOUTS.	350.00	1.25	437.50	\$ 437.50

04/26/2018	Howie Slomka	Review docket and pending motion (15 MINS); draft and file Status report to explain sales of all assets and resulting payments to Debtor. (90 MINUTES) review revised MOR and statements.(30 MINS) review all closing HUDs 15 MINS. (DOC NO. 109)	350.00	2.5	875.00	\$ 875.00
04/27/2018. SHOULD BE 4/26/2018	Fernando Bustelo	Draft spreadsheets for each of the four real estate closing of Debtor. (3 HOURS OF ANALYSIS AND CALLS TO HOWIE) Segregate payments made to secured creditors, taxes, and post-closing expenses. (1 HOUR COORDINATING WITH STATUS REPORT) Email spreadsheets, and operating reports spreadsheets to Lindsay Kolba (30 MINUTES). PARALEGAL TIME IS AGAIN DATED 1 DAY AFTER THE TASK WAS PERFORMED. THIS IS DUE TO SOFTWARE WITH OFF-SITE EMPLOYEE LOGGING IN REMOTELY.	185.00	4.75	878.75	\$ 878.75
04/30/2018. WITHDRAWN. SHOULD BE 4/26/2018	Howie Slomka	prepare and file status report re RE closings; discuss and settle TMTD; prep plan and new fee application. ERROR! THIS 2.5 HOUR CHARGE IS THE SAME AS ENTERED ON APRIL 26. ENTERED FROM MOBILE DEVICE WITH WRONG DATE STAMP WHILE ENTERING APRIL TIME. DID NOT CATCH ERROR WHEN RECONCILING FOR THE ORIGINAL FEE APP.	350.00	2.5	875.00	WITHDRAWN
4/27/2018	HPS	(DOC 110) FILE MARCH 2018 OPERATING REPORT - CONFIRM FORECLOSURE FACTS	350.00	0.25	0.00	\$ 87.50
4/30/2018	HPS	EMAILS WITH L. KOLBA RE MONTHLY OPERATING REPORTS AND UST ESTIMATED FEES DUE; TC TO CLIENT. (15 MINS) EMAILS RE CONSENT ORDER ON UST MTD OR CONVERT (5 MINS)	350.00	0.3	0.00	GRATIS
05/01/2018	Fernando Bustelo	Phone conference with Lindsay Kolba to review amended operating reports and discuss motion to dismiss and liquidating plan with HPS. HPS CALL TO FERNANDO TO DISCUSS NEW REPORTS	185.00	0.25	46.25	\$ 46.25
5/2/2018	hps	TC WITH FERNANDO AND CLIENT TO ADJUST AND AMEND OPERATING REPORTS AND CLOSING STATEMENT CHART. EXPLAIN REQUIREMENTS OF UST FEES AND GETTING CURRENT. CONVERSATION WITH UST RE CONSENT ORDER AND TIMING.		0.5	0.00	GRATIS
05/02/2018	Fernando Bustelo	Draft anew the Operating Reports for the months of September, November and December 2017 (APPROX 1 HOUR FOR EACH ONE) to detail on MOR-2 the disbursements from all closings as well as post-closing expenditures. Reconcile MOR2 with MOR progression spreadsheet. Update evolution of inventory.	185.00	3.25	601.25	\$ 601.25
5/8/2018	HPS	EMAILS RE CONSENT ORDER AND FILING SAME.				GRATIS
5/14/2018	HPS	FINALIZE AND FILE OPERATING REPORTS FOR MONTHS OF CLOSINGS: SEPT 2017 (DOC 113) NOV.2017 (DOC 114) DEC 2017 (DOC 115)	350.00	0.2	0.00	\$ 70.00
5/14/2018	HPS	EMAILS ABOUT CLIENT CHECK TO UST FOR OVERDUE FEES. CLIENT CONFIRMS MAILED ON MAY 11.	350.00	0.3	0.00	GRATIS
5/14/2018	hps	FILE AMENDED OPERATING REPORTS FOR SEPT, NOV, DEC 2017 (DOC 113, 114, 115)	350.00	0.3	0.00	GRATIS
5/15/2018	HPS	EMAILS WITH UST RE MISSING FEES AND CHECK.		0.1	0.00	GRATIS

5/17/2018	HPS	FINALIZE AND FILE OPERATING REPORTS FOR MONTH OF APRIL 2018 (DOC 116). EMAILS WITH UST KOLBA RE FILING DECLARATION OF DEFAULT BASED ON NONPAYMENT OR LATE PAYMENT OF UST FEES.	350.00	0.2	0.00	\$ 70.00
05/30/2018	Howie Slomka	REVIEW NOTICE OF DEFAULT FROM UST. (15 MINUTES) EMAIL REGARDING SAVING CHAPTER 11 CASE AND PREPARING A LIQUIDATING PLAN. (15 MINUTES) DISCUSS PROCEEDING UNDER C7 OR C11 WITH CLIENT (30 MINUTES) prep revise and finalize plan and disclosure statement for filing (1.5 HOURS); review claims AND PRIOR PAYOFFS AND CURRENT STATUS (30 MINUTES); prepare second fee application AND TIME SHEETS (1 HOUR).	350.00	4	1,400.00	\$ 1,400.00
05/30/2018	Fernando Bustelo	Prepare tables of creditors and research mortgagees paid off out of property sales for disclosure statement and liquidating plans. (15 MINUTES) Transmit to HPS. SUPPORT FOR PLAN AND DISCLOSURE STATEMENT PREP (30 MINUTES)	185.00	0.75	138.75	\$ 138.75
05/30/2018	Fernando Bustelo	prepare plan and disclosure statement (DRAFT AND REDRAFT TO FILE PLAN IN ORDER TO JUSTIFY AND EXPLAIN THE LOGIC OF LIQUIDATING OVER CHAPTER 7 CONVERSION. MAY 31 WAS DEADLINE SET TO FILE PLAN IN CONSENT ORDER. and finalize MOR review.	185.00	5	925.00	\$ 925.00
5/31/2018	hps	CLICK TO FILE PLAN (DOC 119) AND DISCLOSURE (DOC 120) FOLLOWING CONFIRMATION FROM CLIENT				GRATIS
5/31/2018		ORDER OF CONVERSION IS ENTERED				
06/07/2018	Howie Slomka	DOC 123, 124) prep and draft motion to reconsider conversion to C7 (90 MINS TOTAL INCLUDING SVC TIME). THIS FOLLOWED DISCUSSION WITH UST AND DEBTOR COUNSEL MISUNDERSTANDING THAT UST ALSO PREFERRED TO REMAIN UNDER LIQUIDATING C11 PLAN.	350.00	1.33333333	466.67	GRATIS
06/15/2018	Howie Slomka	Finalize fee app; file; review docket and motion to reconsider dates	350.00	1	350.00	\$ 350.00
6/18/2018	HPS	REVIEW, PREP AND FILE FINAL OPERATING REPORT FOR MAY 2018 (30 MINS) (DOC 125)	350.00	0.5	0.00	\$ 175.00
6/19/2018	HPS	WITHDRAW MTN TO SELL (DOC 126, 127)		0.25		GRATIS
06/21/2018	Howie Slomka	review docket(30 MINS); prep fee app(30 MINS) ; tc C7 trustee re pending motion to reconsider; tc client (15 MINS)	350.00	1.25	437.50	\$ 437.50
6/26/2018	HPS	(DOC 131, 132)print, review and file fee application FOR COUNSEL AND FOR DEBTOR ACCOUNTANT	350.00	1	0.00	\$ 350.00
				56	\$ 15,746.28	\$ 14,529.60

NEW SUBMITTED TOTAL: \$ 14,529.60

Discount to: 13,000.00

COSTS FOR SECOND INTERIM FEE APPLICATION

11/15/2017	DOC 72 - FILING FEE FOR MOTION TO APPROVE SALE				Filing Fee:	\$	181.00
					Envelopes \$ per		
11/16/2017	Doc 78 - Suppl Mtn to Set Bar Date	39	1.53	\$		59.67	
11/18/2017	Doc 79 - Status Report and COS	39	1.53	\$		59.67	
12/5/2017	Doc 86 - SERVE AMENDED SCHEDULES	39	1.53	\$		59.67	
12/6/2017	DOC 87 SERVE WITHDRAWAL OF POC OBJECTION	39	1.53	\$		59.67	
12/21/2017	Doc 91 - Order granting First Fee Application	39	1.53	\$		59.67	
2/27/2018	DOC 94 - SERVE MOTION TO SELL ANTONE	39	1.53	\$		59.67	
2/27/2018	DOC 95 - FILING FEE FOR MOTN TO SELL ANTONE	39	1.53	\$		59.67	
4/26/2018	DOC 109 - SERVICE OF STATUS REPORT RE PROP SALES	39	1.53	\$		59.67	
6/8/2018	Doc 123 - Motion to reconsider Conversion	39	1.53	\$		59.67	
6/26/2018	Doc 131,132 - Fee App for Acct and second for counsel	39	1.53	\$		59.67	

Subtotal for Costs \$ 777.70

TOTAL SECOND FEE APPLICATION - AMENDED AND DISCOUNTED TOTAL: \$ 13,777.70

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE:)	
)	CHAPTER 11
DN REAL ESTATE SERVICES &)	
ACQUISITIONS, LLC)	
Debtor,)	CASE NO.: 17-55587-PMB
)	

CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of the Debtor's Counsel's Response to United States Trustee's Objection to Second Fee Application in the above styled case by via electronic mail and US Mail to the interested parties as shown below

[See Next Page for Creditors]

Dated: November 12, 2018

/s/ Howard P. Slomka, Esquire
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Label Matrix for Local Addressing
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Case 17-55587-pmb
Northern District of Georgia
Atlanta
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Alpharetta, GA 30009-1254

INTERNAL REVENUE SERVICE
P O BOX 7346
2070 MARKET STREET
PHILADELPHIA, PA 19104-5001

Internal Revenue Service
P. O. Box 7346
Philadelphia, PA 19104-7346

Jeff Stoney
4420 Sylvia Drive
Marietta, GA 30064

Kahaga
PO Box 77071
Atlanta, GA 30357-1071

Lindsay P. S. Kolbe
Office of the U.S. Trustee
Suite 362
75 Ted Turner Drive, S.W.
Atlanta, GA 30333-3336

Lakeland FCU
PO Box 790496
Saint Louis, MO 63179-0496

Secretary of the Treasury
1501 & Pennsylvania Avenue, NW
Washington, DC 20500

Howard P. Slonka
Slipkoff & Slonka, PC
Suite 300
1869 Spring Street, NW
Atlanta, GA 30316-3817

Jeff Stoney
4420 Sylvia Drive
Marietta, GA 30064-1534

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c/o Justin M. Pawluk
675 Maxwell Road
Suite 130
Newell, GA 30076-4871

Thomas Enger
5461 Hedge Brook Cove
Aurora, GA 30011-7143

U. S. Securities and Exchange Commission
Office of Reorganization
Suite 916
910 East Paces Ferry Road, NE
Atlanta, GA 30326-1261

United States Trustee
362 Richard E Russell Bldg
75 Ted Turner Drive, SW
Atlanta, GA 30333-3315

The preferred mailing address (g) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2001 (g)(4).

Bank of America
P.O. Box 1847
Wilson, NC 27894-1847

Bank of America
P.O. Box 962235
El Paso, TX 79996

Fifth Third Bank
38 Fountain Square Place
Cincinnati, OH 45262

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

to: Brandon Hall

to: Lindsey McMullen
c/o Tayer Adkins, broker
taylorpallman@tadcoynation.com

End of Label Matrix
Mailable recipients 23
Bypassed recipients 2
Total 25